

OFFICIAL FILE

ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

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CENTRAL ILLINOIS LIGHT COMPANY )  
d/b/a AmerenCILCO )  
CENTRAL ILLINOIS PUBLIC SERVICE )  
COMPANY d/b/a/ AmerenCIPS, and )  
ILLINOIS POWER COMPANY )  
d/b/a AmerenIP )

CHIEF CLERK'S OFFICE

Docket No. 05-0603

**PETITION TO INTERVENE OF LOCAL UNIONS 51, 309, 649, 702 AND 1306 OF THE  
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO**

Pursuant to 83 Ill. Admin. Code 200.200, Local Unions 51, 309, 649, 702 and 1306 of the International Brotherhood of Electrical Workers, AFL-CIO (hereinafter collectively referred to as "IBEW Locals 51, 309, 649, 702, and 1306"), by their attorneys, petition the Illinois Commerce Commission to intervene in the above-captioned proceeding. In support of their Petition, IBEW Locals 51, 309, 649, 702, and 1306 state:

1. On September 16, 2005, Central Illinois Light Company d/b/a AmerenCILCO, Central Illinois Public Service Company d/b/a AmerenCIPS, and Illinois Power Company d/b/a AmerenIP (collectively the "Ameren Companies") filed a Petition with the Commission to modify their obligation to perform meter sampling tests for electric meters under Code Part 410 of the Commission's rules.

2. Local 51, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 51"), whose main office is located in Springfield, Illinois, is a labor union and the collective bargaining representative of employees employed by AmerenIP (f/k/a Illinois Power Company), AmerenCILCO (f/k/a Central Illinois Light Company), Dynegy Midwest Generation, and Exelon Generation (f/k/a AmerGen Energy Company). IBEW Local 51 has current

collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

3. Local 309, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 309"), whose main office is located in Collinsville, Illinois, is a labor union and the collective bargaining representative of employees employed by AmerenCIPS (f/k/a Central Illinois Public Service Company) and AmerenIP. IBEW Local 309 has current collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

4. Local 649, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 649"), whose main office is located in Alton, Illinois, is a labor union and the collective bargaining representative of employees employed by AmerenCIPS and AmerenIP. IBEW Local 649 has current collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

5. Local 702, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 702"), whose main office is located in West Frankfort, Illinois is a labor union and the collective bargaining representative of employees employed by AmerenIP, Ameren CIPS, and Ameren Energy Generating Company (also f/k/a Central Illinois Public Service Company). IBEW Local 702 has current collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

6. Local 1306, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 1306"), whose main office is located in Decatur, Illinois, is a labor union and the collective bargaining representative of employees employed by Ameren IP. IBEW Local 1306 has current collective bargaining agreements with this public utility and power generating company covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents.

7. The bargaining unit employees represented by IBEW Locals 51, 309, 649, 702 and 1306 at the above public utilities and power generating companies, as their names indicate, are engaged in the generation, transmission and distribution of electric power to industrial, commercial, and residential customers in the State of Illinois.

8. The bargaining unit employees represented by IBEW Locals 51, 309, 649, 702 and 1306 at the above public utilities and power generating companies directly and indirectly perform the obligations of meter sampling tests for the Ameren Companies' electric meters under Code Part 410 of the Commission's rules.

9. IBEW Locals 51, 309, 649, 702, and 1306 and its members have a direct and material interest in and may be affected by the outcome of this Commission proceeding based on the relief sought by the Ameren Companies.

10. The interests of IBEW Locals 51, 309, 649, 702, and 1306 and its members are not adequately represented by any other party to this proceeding.

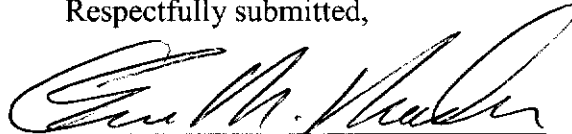
11. IBEW Locals 51, 309, 649, 702, and 1306 have the legal authority to intervene on behalf of its members and represent their interests in this Commission proceeding. See *WPS Energy Service, Inc.*, Docket No. 00-0199, Order Reopening Proceeding (March 16, 2001).

12. IBEW Locals 51, 309, 649, 702, and 1306 seek to intervene and be treated as parties in the proceeding and will accept service by electronic means as provided for in 83 Ill. Admin. Code Section 200.200(a). IBEW Locals 51, 309, 649, 702, and 1306 request that the following information be added to the service list:

Eric M. Madiar  
Freeborn & Peters LLP  
217 East Monroe Street, Suite 202  
Springfield, IL 62701  
(217) 535-1060  
(217) 535-1069 (fax)  
E-mail: [emadiar@freebornpeters.com](mailto:emadiar@freebornpeters.com)

WHEREFORE, IBEW Locals 51, 309, 649, 702, and 1306 respectfully petition the Illinois Commerce Commission for leave to intervene and be treated as parties in the above-captioned proceeding and to pursue the points made in this Petition to Intervene before the Commission.

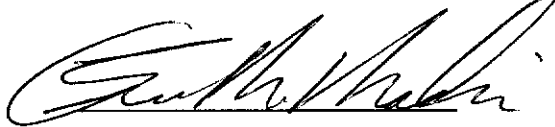
Respectfully submitted,



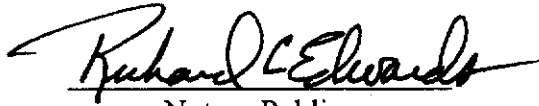
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**VERIFICATION**

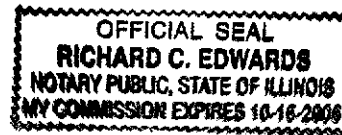
I, Eric M. Madiar, first being duly sworn upon my oath, depose, and state that I am one of the attorneys for Local Unions 51, 309, 649, 702, and 1306 International Brotherhood of Electrical Workers, that I have read the above and foregoing Petition to Intervene by me situated and know the contents thereof; and that said contents are true in substance and in fact.



Subscribed and sworn before me this 24<sup>th</sup> day of October, 2005.



Notary Public



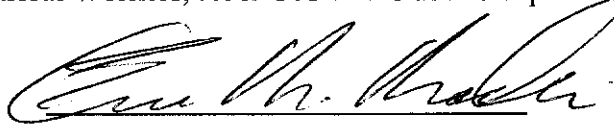
**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

<b>CENTRAL ILLINOIS LIGHT COMPANY</b>	)	
<b>d/b/a AmerenCILCO</b>	)	
<b>CENTRAL ILLINOIS PUBLIC SERVICE</b>	)	<b>Docket No. 05-0603</b>
<b>COMPANY d/b/a/ AmerenCIPS, and</b>	)	
<b>ILLINOIS POWER COMPANY</b>	)	
<b>d/b/a AmerenIP</b>	)	

**NOTICE OF FILING**

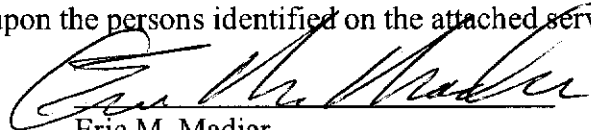
Please take notice that on October 24, 2005, I caused to be filed with the Chief Clerk of the Illinois Commerce Commission, Elizabeth Rolando, 527 East Capitol Avenue, Springfield, IL 62701 the enclosed Petition to Intervene of Local Unions 51, 309, 649, 702 and 1306 of the International Brotherhood of Electrical Workers, AFL-CIO in the above-captioned proceeding.



Eric M. Madiar  
Attorney for Local Unions 51, 309, 649, 702 and 1306  
International Brotherhood of Electrical Workers, AFL-CIO

**CERTIFICATE OF SERVICE**

Please take note that on October 24, 2005, I, Eric M. Madiar, hereby certify that I did file with the Illinois Commerce Commission the foregoing Petition for Leave to Intervene and electronically served the same upon the persons identified on the attached service list.



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Attorney for Local Unions 51, 309, 649, 702 and 1306  
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